

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**NATALIE REESER,**

Plaintiff,

v

Case No. 2:14-cv-11916-GCS-MJH

Hon. George Caram Steeh

Magistrate Judge Stephanie Dawkins Davis

**HENRY FORD HOSPITAL,**

Defendant.

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**MILLER COHEN, P.L.C.**

Keith D. Flynn (P74192)

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**VARNUM LLP**

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**PLAINTIFF'S EX PARTE MOTION FOR LEAVE  
TO EXCEED PAGE LIMIT FOR REPLY BRIEF  
IN SUPPORT OF MOTION FOR ATTORNEYS' FEES**

NOW COMES Plaintiff NATALIE REESER, by and through her counsel, requests that this Court allow Plaintiff to file a Reply Brief in Support of her Motion for Attorneys' Fees that exceeds the seven page limit established by L.R. 7.1(d)(3)(B) by an additional thirteen (13) pages. Defendant's Brief in Opposition to Plaintiff's Motion is **33 pages long** with an additional **215 pages of exhibits**. Many of these exhibits are charts that include **four alleged justifications** to exclude or reduce attorney fees for each time entry over a two year case. Such a length is

absurd and quite frankly ironic for a post-judgment response that asks this court to deny attorney fees, because Plaintiff's actions have led to excessive litigation. It is simply impossible to reply to each of the issues raised in Defendant's **250 page tome** in 7 pages. For this reason, Plaintiff requests an extension to twenty (20) pages to adequately address Defendant's arguments.

Plaintiff sought concurrence and was unable to obtain a response.

Respectfully submitted,

**MILLER COHEN, P.L.C.**

By: /s/Adam C. Graham  
Keith D. Flynn (P74192)  
Adam C. Graham (P79361)  
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Dated: July 15, 2016

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**CERTIFICATE OF SERVICE**

I hereby certify that on *July 15, 2016*, I electronically filed the foregoing document(s) with the Court using the ECF system, which will send notification of such filing to all counsel of record.

Respectfully submitted,

**MILLER COHEN, P.L.C.**

By: /s/Adam C. Graham

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